

# IRRIGATION & ELECTRICAL DISTRICTS ASSOCIATION OF ARIZONA

R.D. JUSTICE  
PRESIDENT  
  
ELSTON GRUBAUGH  
VICE-PRESIDENT

SUITE 140  
340 E. PALM LANE  
PHOENIX, ARIZONA 85004-4603  
(602) 254-5908  
Fax (602) 257-9542  
E-mail: [rslynch@rslynchaty.com](mailto:rslynch@rslynchaty.com)

WILLIAM H. STACY  
SECRETARY-TREASURER  
  
ROBERT S. LYNCH  
COUNSEL AND  
ASSISTANT SECRETARY-TREASURER

E-MAILED ONLY

September 27, 2012

[WAPAOPSSTUDY@wapa.gov](mailto:WAPAOPSSTUDY@wapa.gov)

Re: Miracorp Western Area Power Administration Operations Study Report distributed August 9, 2012

Ladies and Gentlemen:

The Irrigation & Electrical Districts' Association of Arizona is a voluntary association of 25 entities that receive public power from the Western Area Power Administration directly or through the Arizona Power Authority. Our members are always concerned about studies and proposals that hypothesize changes in Western operations. For that reason, we were greatly concerned about suggestions made in the Miracorp study. We are concerned that it tracks too closely the flawed proposals in Secretary of Energy Chu's March 16, 2012 memorandum concerning the power marketing administrations. We would appreciate some specific articulation from Western about what the relationship is between the Department of Energy initiative and this proposal, if any.

Having said that, we have reviewed the comments of the Colorado River Energy Distributors' Association, of which we are a member and board member. We wish to reiterate those comments and support them and hope that you will take the suggestions in them to heart.

We look forward to a response and to working with you further on this subject.

Sincerely,

/s/

Robert S. Lynch  
Assistant Secretary/Treasurer

RSL:psr